UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK UNITED STATES OF AMERICA GOVERNMENT'S FORFEITURE -v.-BILL OF PARTICULARS 13 Cr. 368 (DLC) LIBERTY RESERVE S.A., ARTHUR BUDOVSKY, a/k/a "Arthur Belanchuk," a/k/a "Eric Paltz," VLADIMIR KATS, a/k/a "Ragnar," AHMED YASSINE ABDELGHANI, a/k/a "Alex," ALLAN ESTEBAN HIDALGO JIMENEZ, a/k/a "Allan Garcia," AZZEDDINE EL AMINE, MARK MARMILEV, a/k/a "Marko," and MAXIM CHUKHAREV, Defendants.

Pursuant to <u>United States</u> v. <u>Grammatikos</u>, 633 F.2d 1013, 1024 (2d Cir. 1980), the Government respectfully amends notice that the property subject to forfeiture as a result of the offenses described in Counts One and Three of the Indictment, as alleged in the Forfeiture Allegation and/or the Substitute Assets Provision in the Indictment, includes the following properties:

1. Vesting 124 te 2141 MD Vijfhuizen, Nederland, kadastraal bekend gemeente Haarlemmermeer, sectie AC, complexaanduiding 1359 A, appartementenindex 51, uitmakende het eenhonderd drieentwintig I zevenduizend zeshonderd achtenvijftigste (123/7.658^{ste}) onverdeeld aandeel in de gemeenschap, bestaande uit het gebouw genaamd "Vesting 5Huizen" met ondergrond, omvattende zesenzestig (66) woningen, negenendertig (39) bergingen en tachtig (80) parkeerplaatsen, ten tijde van de splitsing in appartementsrechten, kadastraal bekend gemeente Haarlemmermeer, sectie AC, nummer 1356, groot twee en dertig are elf centiare (32.11 are);

Translation: Vesting 124, 2141 MD, Vijfhuizen, Netherlands, cadastral municipality of Haarlemmermeer, section AC, complex designation 1359 A, apartment index 51 constituting the one hundred twenty-three / seven thousand six hundred fifty-eighth (123 / 7,658^{ste}) undivided share in the community, consisting of the building called "Vesting 5Huizen" the foundation with sixty-six (66) houses, thirty-nine (39) storage units, and eighty (80) parking spaces, at the time of the division into condos, known in the registry as Haarlemmermeer, section AC, number 1356, measuring thirty-two thousand and eleven square meters (3,211 square meters); and

Vesting 78, 2141 MD, Vijfhuizen, Nederland,

kadastraal bekend gemeente Haarlemmermeer, sectie AC, nummer 1359 A-76, uitmakende het het appartementsrecht, rechtgevende op het uitsluitend gebruik van de woning met balkon gelegen op de eerste verdieping van na te melden gebouw, uitmakende het een en zestig/zevenduizend zeshonderd acht en vijftigste (61/7.658^{ste}) onverdeeld aandeel in de gemeenschap en het appartementsrecht, recht gevende op het uitsluitend gebruik van de parkeerplaats, behorende bij het hiervoor omschreven appartementsrecht en gelegen in de kelder van het onderstaande gebouw, kadastraal bekend gemeente Haarlemmermeer, sectie AC nummer 1359 A-76, uitmakende het drie en twintig/zevenduizend zeshonderd acht en vijftigste (23/7.658^{ste}) onverdeeld aandeel in de hiervoor omschreven gemeenschap aandeel in de gemeenschap bestaande uit: zes en zestig woningen, negen en dertig bergingen en tachtig parkeerplaatsen ten tijde van de splitsing kadastraal bekend gemeente Haarlemmermeer, sectie AC, nummer 1356, groot 0 hectare 32 are 11 centiare;

Translation: Vesting 78, 2141 MD, Vijfhuizen, Netherlands, cadastral municipality of Haarlemmermeer, section AC, number 1359 A-76, to constitute condo ownership, giving right to the exclusive use of the dwelling with balcony located on the first floor of the aforementioned building, constituting sixty-one / seven thousand six hundred and fifty-eight (61 / 7,658 $^{\text{ste}}$) undivided share in the community and the condo, giving right to the exclusive use of the parking area belonging to the condo described above and located in the basement of the mentioned building, cadastral municipality Haarlemmermeer section AC No. 1359 A -76, constituting twenty-three / seven thousand six hundred and fifty-eight (23 / 7,658 ste) undivided share in the above-described community consisting of sixty-six homes, thirty-nine storage spaces, and eighty parking spaces at the time of the split known in the registry as Haarlemmermeer, AC section, number 1356, measuring 3,211 square meters; and

3. Finca # 1-326288-000 ubicada en Costa Rica, San José, Escazú, San Rafael, Bello Horizonte arriba, 200 metros sur de los tanques del AYA, cédula jurídica 3-101-448089;

<u>Translation</u>: Property # 1-326288-000 located in Costa Rica, San Jose, Escazu, San Rafael, Bello Horizonte up, 200 meters south of the tanks of the AYA, judicial certificate 3-101-448089; and

4. Finca # 1-228682-000 ubicada en Costa Rica, San José, Escazú, San Rafael, de la sub-estación del ICE 150 metros norte, casa esquinera a lado derecha, con muro color gris, con piedra café, con reja color marrón, cédula jurídica 3-101-482413;

<u>Translation</u>: Property # 1-228682-000 located in Costa Rica, San Jose, Escazu, San Rafael, 150 meters North of the sub-station of the ICE, corner house on the right hand side, with wall grey, with brown stone, with brown grating, legal ID 3-101-482413; and

5. Finca # 1-518488-000 ubicada en Costa Rica, San José, Escazú, San Rafael, de la sub-estación del ICE 150 metros norte, 15 metros al oeste, se encuentra ubicada contiguo a la vivienda de Grupo Santillana Yamural, ésta se encuentra a nombre de 3-102-618923 Sociedad de Responsabilidad Limitada;

Translation: Property # 1-518488-000 located in Costa Rica, San Jose, Escazu, San Rafael, 150 meters north of the sub-station of the ICE, 15 meters to the West, is located adjacent to the dwelling of Grupo Santillana Yamural, is on behalf of 3-102-618923 limited liability company; and

6. Finca # 1-225782-000 ubicada en Costa Rica, San José, Escazú, San Rafael, de la sub-estación del ICE 150 metros norte, 125 metros oeste, lote a mano izquierda, la cual se encuentra a nombre de Ufta Deda S.A. cédula jurídica 3-101-435126;

<u>Translation</u>: Property # 1-225782-000 located in Costa Rica, San Jose, Escazu, San Rafael, 150 meters north of the sub-station of the ICE, 125 meters west, lot on the left, which is in the name of Ufta Deda S.A. legal ID 3-101-435126; and

7. Finca # 1-605546-000 / 1-605547-000 / 1-605548-000 ubicadas en Costa Rica, San José, Escazú, San Rafael, de la sub-estación del ICE 150 metros norte, las cuales se encuentran a nombre de 3-102-575822 Sociedad de Responsabilidad Limitada. Consta de tres lotes juntos.

Translation: Property # 1-605546-000 / 1-605547-000 /1-605548-000 located in Costa Rica, San Jose, Escazu, San Rafael, 150 meters north of the sub-station of the ICE, which are on behalf of 3-102-575822 limited liability company. It consists of three lots together; and

8. Finca # 1-403624-000 ubicada en Costa Rica, San José, Santa Ana, del Restaurante el Restribo 100 metros oeste, 150 metros sur, la cual se encuentra a nombre de Corporación Lubamyra Love S.A. cédula jurídica 3-101-506508;

<u>Translation</u>: Property # 1-403624-000 located in Costa Rica, San Jose, Santa Ana, 100 meters west of the Restribo Restaurant, 150 meters South, which is on behalf of Corporation Lubamyra Love S.A. 3-101-506508 legal identity.

Dated: New York, New York
December 15, 2014

Respectfully Submitted, PREET BHARARA United States Attorney

By: /s/
CHRISTINE I. MAGDO

Assistant United States Attorney

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